

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD A. McCURDY, JR., et al.	:	CIVIL ACTION
	:	
v.	:	
	:	NO. 02-2879
	:	
WILLIAM STANCILL	:	
And	:	
F&A SALES AND SERVICES, INC.	:	

**MOTION OF PLAINTIFFS TO COMPEL DEFENDANTS,  
TOTAL CONSTRUCTION SERVICES, INC. TO PROVIDE  
MORE SPECIFIC ANSWERS TO INTERROGATORIES**

Plaintiffs, by and through their attorneys, Masterson, Braunfeld & Milner, LLP, hereby move this Court pursuant to Federal Rule of Civil Procedure 37 for an Order compelling Total Construction Services, Inc. to provide more specific answers to Plaintiffs' Interrogatories and Request for Production of Documents and in support thereof aver as follows:

1. On or about August 8, 2002, Plaintiffs served Defendant, Total Construction Services, with Interrogatories in the form set forth in Exhibit "A" hereto.

2. On or about August 8, 2002, Plaintiffs served Defendant, Total Construction Service, with Request for Production of Documents in the form set forth as Exhibit "B" hereto.

3. On or about September 26, 2002, Defendant served Plaintiffs with the Answers to Interrogatories set forth as

Exhibit "C" hereto.

4. On or about September 26, 2002, Defendant, Total Construction Services, served Plaintiffs with the responses attached as Exhibit "D" hereto to Plaintiffs' Request for Production of Documents.

5. With regard to Interrogatories numbers 4, 6 and 9 and Requests for Production of Documents 1, 2, 4, 7, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 23 and 28, Defendant responded "to be supplied."

6. Plaintiffs require full and complete responses to same in order to be able to conduct depositions and prepare for trial.

WHEREFORE, Plaintiffs respectfully request this Honorable Court enter the attached Order requiring Defendant, Total Construction Services, to provide full and complete responses to discovery within five (5) days.

Respectfully submitted,

MASTERSON, BRAUNFELD & MILNER, LLP

By:

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Nancy L. Goldstein, Esquire  
Identification No. 40019  
Suite 702, One Montgomery Plaza  
Norristown, PA 19401  
(610) 277-1700  
Attorney for Plaintiffs

**CERTIFICATION OF GOOD FAITH**

I hereby certify that I have conferred with Gary Gusoff, Esquire, in an effort to resolve these issues without the need for court action.

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Nancy L. Goldstein, Esquire

**CERTIFICATION OF SERVICE**

I, Nancy L. Goldstein, Esquire hereby certify that on the 11th day of October, 2002, I caused a true and correct copy of the Motion of Plaintiffs to Compel Defendants, Total Construction Services, to Provide More Specific Answers to Interrogatories and Request for Production of Documents to be served upon the following counsel by transmitting same via facsimile number (215) 717-1220.

Gary M. Gusoff, Esquire  
1617 John F. Kennedy Boulevard  
Suite 1250, One Penn Center  
Philadelphia, PA 19103  
215-717-1212  
Attorney for Defendant  
William Stancill

MASTERSON, BRAUNFELD & MILNER, LLP

By: \_\_\_\_\_  
Nancy L. Goldstein, Esquire

Dated: \_\_\_\_\_